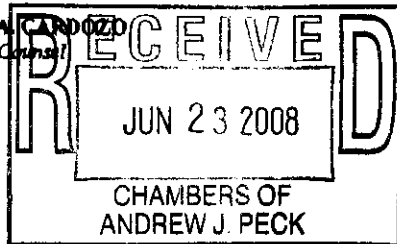




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THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

MICHAEL A. CARDOZO  
Corporation Counsel



Blanche Greenfield  
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June 23, 2008

**BY FACSIMILE**

Magistrate Judge Andrew J. Peck  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
(212) 805-7933

**MEMO ENDORSED** - 92

**Re: Teachers4Action et al., v. Bloomberg, et al.,**  
**08 Civ. 0548 (VM) (AJP)**

Dear Magistrate Judge Peck,

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for City defendants in the above captioned action. As this Court is aware, by letter application dated May 30<sup>th</sup>, plaintiffs requested permission to inspect certain Temporary Reassignment Centers ("TRC") before "the end of the school year on June 26, 2008." This Court granted plaintiffs' request

to inspect three facilities. The Court subsequently modified the Order to limit the inspection to the TRC located at 4111 Broadway.

Having failed to hear from plaintiffs' counsel regarding the scheduling of the inspection, I sent counsel an e-mail on June 20, 2008 proposing that the inspection take place this Wednesday June 25<sup>th</sup> or Thursday June 26<sup>th</sup>. By letter dated today, June 23, 2008, plaintiffs' counsel advises the Court that he "will communicate with my adversaries about the exact date for the Videography, the best date for which appears to be this Friday."

However, as the school year ends on June 26, 2008, the TRC located at 4111 Broadway will not be open this Friday. Accordingly, to the extent that plaintiff's June 23, 2008 letter is a request for an enlargement of time to conduct the inspection, City defendants respectfully request that the request be denied. City defendants request that the inspection of the TRC located at 4111 Broadway take place no later than Thursday afternoon June 26, 2008.

Thank you for your consideration in this matter.

Respectfully,



Blanche Greenfield  
Assistant Corporation Counsel

cc: Edward Fagan by e-mail  
Charles Moerdler, by facsimile

## MEMO ENDORSED 6/23/08

The parties need to work this out in details out - since the room is the room of the building & can't get very heated as to whether it is Thursday or Friday. But deposits counsel advised it is a problem, which it is not properly presented. Perhaps it should be presented to the Court with the CV of the kind videography - whether being for 2 videographers or "way" to be kind is not sufficient.

**BY FAX**

2

SO ORDERED:

Hon. Andrew Jay Peck  
United States Magistrate Judge

*cm R. J. Peck and J. P. Hannon*

Jun 23 2008 17:26 P.03

Fax: 212-341-3934

NYC LHM DEPARTMENT

# FAX TRANSMITTAL SHEET



**ANDREW J. PECK  
UNITED STATES MAGISTRATE JUDGE  
UNITED STATES DISTRICT COURT**

Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 1370  
New York, N.Y. 10007-1312

Fax No.: (212) 805-7933  
Telephone No.: (212) 805-0036

**Dated:** June 23, 2008

**Total Number of Pages:** 3

TO	FAX NUMBER
Edward D. Fagan, Esq.	646-304-6446 or 646-417-5558
Blanche Greenfield, Esq.	212-788-8877
Charles G. Moerdler, Esq.	212-806-2647

## **TRANSCRIPTION:**

### **MEMO ENDORSED 6/23/08**

The parties need to work these sort of details out – since the room is to be vacant of teachers, I can't get very excited as to whether it is Thursday or Friday. But defendants' counsel are entitled to advance notice, which plaintiff has not properly given yet. Nor has plaintiff provided the Court with the CV of the hired videographer – website listings for 2 videographers who "may" be hired is not sufficient.

**Copy to:** Judge Victor Marrero